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Attorney for Jess Elijah Carranza

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

**Plaintiff,**

V.

JESS ELIJIO CARRANZA.

**Defendant**

Case No. 2:19-cr-00310-RFB-BNW

## **STIPULATION TO CONTINUE TRIAL DATES**

### (Seventh Request)

IT IS HEREBY STIPULATED AND AGREED, by and between Christopher Chiou, Acting United States Attorney, and Daniel E. Clarkson, Assistant United States Attorney, counsel for the United States of America, and Rene L. Valladares, Federal Public Defender, and Paul D. Riddle, Assistant Federal Public Defender, counsel for Jess Elijo Carranza, that the calendar call currently scheduled for July 6, 2021 at 1:30 PM, and the trial scheduled for July 12, 2021 at 9:00 AM, be vacated and set to a date and time convenient to this Court, but no sooner than sixty (60) days.

The Stipulation is entered into for the following reasons:

1. Counsel for the defendant needs additional time to conduct investigation in this case in order to determine whether there are any pretrial issues that must be litigated and whether the case will ultimately go to trial or will be resolved through negotiations.

1           2. The parties agree to the continuance.  
2           3. The defendant is in custody and agrees with the need for the continuance.  
3           4. The additional time requested herein is not sought for purposes of delay, but  
4 merely to allow counsel for defendant sufficient time within which to be able to effectively and  
5 complete investigation of the discovery materials provided.

6           5. Additionally, denial of this request for continuance could result in a miscarriage  
7 of justice. The additional time requested by this Stipulation is excludable in computing the time  
8 within which the trial herein must commence pursuant to the Speedy Trial Act, Title 18, United  
9 States Code, Section 3161(h)(7)(A), considering the factors under Title 18, United States Code,  
10 Section 3161(h)(7)(B)(i), (iv).

11          This is the seventh stipulation to continue filed herein.

12          DATED this 18<sup>th</sup> day of June, 2021.

13          RENE L. VALLADARES  
14          Federal Public Defender

15          By /s/ Paul D. Riddle

16          PAUL D. RIDDLE  
Assistant Federal Public Defender

CHRISTOPHER CHIOU  
Acting United States Attorney

By /s/ Daniel E. Clarkson

DANIEL E. CLARKSON  
Assistant United States Attorney

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,  
Plaintiff,  
v.  
JESS ELIJIO CARRANZA,  
Defendant.

Case No. 2:19-cr-00310-RFB-BNW

## FINDINGS OF FACT, CONCLUSIONS OF LAW AND ORDER

## **FINDINGS OF FACT**

Based on the pending Stipulation of counsel, and good cause appearing therefore, the Court finds that:

1. Counsel for the defendant needs additional time to conduct investigation in this case in order to determine whether there are any pretrial issues that must be litigated and whether the case will ultimately go to trial or will be resolved through negotiations.

2. The parties agree to the continuance.

3. The defendant is in custody and agrees with the need for the continuance.

4. The additional time requested herein is not sought for purposes of delay, but merely to allow counsel for defendant sufficient time within which to be able to effectively and complete investigation of the discovery materials provided.

5. Additionally, denial of this request for continuance could result in a miscarriage of justice. The additional time requested by this Stipulation is excludable in computing the time within which the trial herein must commence pursuant to the Speedy Trial Act, Title 18, United States Code, Section 3161(h)(7)(A), considering the factors under Title 18, United States Code, Section 3161(h)(7)(B)(i), (iv).

## **CONCLUSIONS OF LAW**

The ends of justice served by granting said continuance outweigh the best interest of the public and the defendant in a speedy trial, since the failure to grant said continuance would be likely to result in a miscarriage of justice, would deny the parties herein sufficient time and the opportunity within which to be able to effectively and thoroughly prepare for trial, taking into account the exercise of due diligence.

The continuance sought herein is excludable under the Speedy Trial Act, Title 18, United States Code, Section § 3161 (h)(7)(A), when the considering the factors under Title 18, United States Code, § 3161(h)(7)(B)(i), (iv).

## ORDER

IT IS ORDERED that trial briefs, proposed voir dire questions, proposed jury instructions, and a list of the Government's prospective witnesses must be electronically submitted to the Court by the 3rd day of September , 2021, by the hour of 4:00 p.m.

IT IS FURTHER ORDERED that the calendar call currently scheduled for July 6, 2021, at the hour of 1:30 p.m., be vacated and continued to September 7, 2021 at the hour of 1:30 p.m.; and the trial currently scheduled for July 12, 2021, at the hour of 9:00 a.m., be vacated and continued to September 13, 2021 at the hour of 9 :00 a .m.

IT IS FURTHER ORDERED that the Master Trial Scheduling Conference set for June 21, 2021 before Judge Jennifer A. Dorsey is Vacated.

DATED this 18th day of June, 2021.

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RICHARD F. BOULWARE, II  
UNITED STATES DISTRICT JUDGE